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Attorney for Defendant,
WESTERN CAB COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THEODORE TRAPP, on his own behalf)	Case No:
)	2:09-CV-00995-LDG-GWF
And on behalf of all others similarly)	
situated,)	
)	
Plaintiff,)	
)	
vs.)	DEFENDANT, WESTERN CAB
)	COMPANY'S DEMAND FOR
)	SECURITY OF COSTS
BIG POPPA'S, LLC, a Nevada limited)	
Liability company d/b/a BADDA BING)	
INC., a Nevada Corporation d/b/a CAN)	
CAN ROOM; LA FUENTE, INC., a)	
Nevada Corporation d/b/a CHEETAH'S;)	
C.P. FOOD AND BEVERAGE, INC., a)	
Nevada Corporation d/b/a CLUB)	
PARADISE; DÉJÀ VU SHOWGIRLS OF)	
LAS VEGAS, LLC, a Nevada Limited)	
Liability Company d/b/a DÉJÀ VU)	
SHOWGIRLS; PALOMINO CLUB, INC.,)	
A Nevada Corporation d/b/a PALOMINO)	
CLUB; SHAC, LLC, a Nevada Limited)	
Liability Company d/b/a SAPPHIRE;)	
K-KEL, INC., a Nevada Corporation d/b/a)	
SPEARMINT RHINO; D.2801)	
WESTWOOD, INC., a Nevada Corporation)	
d/b/a TREASURES; LITTLE DARLINGS)	
OF LAS VEGAS, LLC, a Nevada Limited)	
Liability Company d/b/a LITTLE)	
DARLINGS; O.G. ELIADES, A.D., LLC,)	
A Nevada Limited Liability Company d/b/a)	
OLYMPIC GARDENS; LAS VEGAS)	
ENTERTAINMENT, LLC, a Nevada)	

Limited Liability Company d/b/a LARRY)
 FLYNT'S HUSTLER CLUB; MICHAEL)
 A SALTMAN d/b/a MINXX; RICK'S)
 LAS VEGAS; FRIAS MANAGEMENT,)
 LLC, a Nevada Limited Liability Company)
 d/b/a ACE CAB COMPANY and)
 A-NORTH LAS VEGAS CAB; WESTERN)
 CAB COMPANY, a Nevada Corporation)
 d/b/a WESTERN CAB COMPANY and)
 WESTERN LIMOUSINE; NEVADA)
 CHECKER CAB CORPORATION, a)
 Nevada Corporation d/b/a CHECKER CAB)
 COMPANY; NEVADA STAR CAB)
 CORPORATION, a Nevada Corporation)
 d/b/a STAR CAB COMPANY; NEVADA)
 YELLOW CAB CORPORATION, a)
 Nevada Corporation d/b/a YELLOW CAB)
 COMPANY; LUCKY CAB COMPANY)
 OF NEVADA, a Nevada Corporation d/b/a)
 LUCKY TRANS; SUN CAB, INC., a)
 Nevada Corporation d/b/a NELLIS CAB)
 COMPANY; CLS NEVADA, LLC, a)
 Nevada Limited Liability Company d/b/a)
 CLS TRANSPORTATION LAS VEGAS;)
 ON DEMAND SEDAN SERVICES, LLC,)
 A Nevada Limited Liability Company d/b/a)
 ODS LIMOUSINE and ODS)
 CHAUFFEURED TRANSPORTATION;)
 BLS LIMOUSINE SERVICE OF LAS)
 VEGAS, INC., a Nevada Corporation d/b/a)
 BLS LIMOUSINE SERVICE OF LAS)
 VEGAS; DESERT CAB, INC., a Nevada)
 Corporation d/b/a DESERT CAB)
 COMPANY and ODYSSEY)
 LIMOUSINE; BELL TRANS A NEVADA)
 CORPORATION, a Nevada Corporation)
 d/b/a BELL TRANS; TONY CHONG, an)
 individual; and DOE EMPLOYEES 1-1000;)
)
 Defendants.)
 _____)

TO: THEODORE TRAPP, Plaintiff; and

TO: JAY EDELSON, RAFFEY BALABANIAN, and JAMES SMYTH,

his attorneys.

Pursuant to NRS 18.130, Defendant, WESTERN CAB COMPANY hereby makes demand upon Plaintiff, who resides out of State, for security in the amount of Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be awarded herein against Plaintiff. The requirements of NRS 18.130 apply to actions in the United States District Court, District of Nevada. *Truck Ins. Exchange*, 683 F. Supp. 223, 227-28 (D. Nev. 1988); *Hamar v. Hyatt Corp*, 98 F.R.D. 305, 305-306 (D. Nev. 1983).

Dated this 25th day of June, 2009.

MORAN LAW FIRM, LLC

/s/ John T. Moran, Jr.
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